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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NATIONAL TPS ALLIANCE, DENIS
MOLINA, JHONY SILVA, MARIA ELENA
HERNANDEZ, O.C., SANDHYA LAMA, S.K.,
and TEOFILO MARTINEZ,

Plaintiffs,

vs.

KRISTI NOEM, in her official capacity as
Secretary of Homeland Security, UNITED
STATES DEPARTMENT OF HOMELAND
SECURITY, and UNITED STATES OF
AMERICA,

Defendants.

Case No. 3:25-cv-05687-TLT

**DECLARATION OF JESSICA KARP
BANSAL IN SUPPORT OF PLAINTIFFS’
ADMINISTRATIVE MOTION TO
EXPEDITE PRODUCTION OF THE
CERTIFIED ADMINISTRATIVE
RECORDS**

Complaint Filed: July 7, 2025

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DECLARATION OF JESSICA KARP BANSAL

I, Jessica Karp Bansal, declare as follows:

1. I am an attorney at law duly licensed and entitled to practice in the State of California. I am an attorney with the National Day Laborer Organizing Network and counsel of record in this action for Plaintiffs. I have personal knowledge of the facts set forth in this declaration and, if called as a witness, I could and would testify competently thereto.

2. I file this Declaration in support of Plaintiffs' Administrative Motion to Expedite Production of the Certified Administrative Records.

3. This matter pertains to the Department of Homeland Security's ("DHS") unlawful decision to terminate Temporary Protected Status ("TPS") for Honduras, Nicaragua, and Nepal. The termination of Nepal's 2015 designation will go into effect on August 5, 2025; thereafter, Nepali TPS holders will lose their work authorization and become subject to deportation. The terminations of Honduras and Nicaragua's TPS designations will go into effect on September 8, 2025. Thereafter, Honduran and Nicaraguan TPS holders will lose their work authorization and become subject to deportation. Plaintiffs allege that the DHS Secretary's decisions to terminate are unlawful under the Administrative Procedure Act ("APA") and the Anti-Discrimination guarantee of the Fifth Amendment's Due Process Clause, and must be set aside.

4. On July 8, 2025, my co-counsel Emilou MacLean emailed Defendants' counsel to inform them that Plaintiffs would seek expedited production of the certified administrative records ("CARs") within seven (7) days for Defendants' decisions terminating TPS for Nepal, Honduras, and Nicaragua in this case, as well as for Defendants' decision terminating TPS for Haiti in *National TPS Alliance, et al. v. Noem, et. al.*, Case No. 25-cv-1766 (N.D. Cal. filed Feb. 19, 2025) ("*National TPS Alliance I*"). When Defendants stated they could not produce all four CARs within seven days and requested that Plaintiffs propose a different schedule, Ms. MacLean stated that Plaintiffs would be amenable to the production of the administrative records for Nepal and Nicaragua within seven (7) days, and for Honduras and Haiti within fourteen (14) days. Defendants' counsel would not agree to either of Plaintiffs' proposed schedules, and said the fastest they could produce the CARs would

1 be one CAR every two weeks or all four CARs within six weeks. This correspondence is attached as
2 **Exhibit 1.**

3 5. In *Nat'l TPS Alliance v. Noem*, No. 3:25-cv-01766-EMC (N.D. Cal. 2025), the Court
4 ordered Defendants to produce the Venezuela CARs within seven days. After producing the
5 Venezuela CARs, the Court ordered Defendants to produce the Haiti CAR within 7 days. All three
6 CARs contained fifty or fewer documents. *See id.* at ECF Nos. 103–04, 110. In *Ramos v. Nielson*,
7 Case No. 3:18-cv-01554-EMC (N.D. Cal. June 25, 2018), ECF No. 34 at 4, the relevant CARs were
8 ordered produced in ten days (Sudan and Nicaragua) and seven days after that (El Salvador and
9 Haiti). All four CARs contained fewer than 50 documents. *Id.* at ECF Nos. 111–14.

10 6. There have been no prior time modifications in this case, and this time modification
11 would have no direct effect on the schedule for the case, except for allowing for more expeditious
12 filing of future merits motions.

13 I declare under penalty of perjury under the laws of the United States of America that the
14 foregoing is true and correct.

15 Executed on July 11, 2025, in Claremont, California.

16 /s/ Jessica Karp Bansal
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